

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CLIFFSTAR CORPORATION V.
AJINOMOTO COMPANY, INC., et al

DOCKET NO.

09-03867-LDD

**JOINT STIPULATION FOR EXTENSION OF TIME TO MOVE, ANSWER OR
OTHERWISE PLEAD IN RESPONSE TO PLAINTIFF'S COMPLAINT**

Counsel for Plaintiff and counsel for Defendants Daesang Corporation f/k/a Miwon Company Ltd. and Daesang America, Inc. f/k/a Miwon America, Inc. ("Daesang Defendants") hereby stipulate that the date by which the Daesang Defendants must move, answer, or otherwise plead in response to Plaintiff's Complaint in the above-captioned matter shall be extended as follows:

1. If the Court denies certain Defendants' Motion to Stay (Dkt 42), the date by which the Daesang Defendants must move, answer, or otherwise plead in response to Plaintiff's Complaint shall be extended to thirty days after the date of the Court's ruling on certain Defendants' Motion to Stay. The Daesang Defendants reserve their right to move the Court for additional time to respond to Plaintiff's Complaint, if necessary.

2. If the Court grants certain Defendants' Motion to Stay, the obligation of the Daesang Defendants to move, answer, or otherwise plead in response to Plaintiff's Complaint shall be stayed as per this Court's ruling. Upon expiration of the stay, the parties will promptly move the Court for entry of an appropriate case management schedule, including a date by which Defendants must move, answer, or otherwise plead in response to Plaintiff's Complaint.

All defenses, including specifically the defense of lack of personal jurisdiction, are preserved.

Dated: March 25, 2010

Respectfully submitted,

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Co-Lead Counsel for the Direct Purchaser Class

SO ORDERED:

Hon. Legrome D. Davis
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused a true and correct copy of the foregoing Joint Stipulation for Extension of Time to Move, Answer or Otherwise Plead in Response to Plaintiff's Complaint to be filed electronically with the Court which in turn electronically served the following individuals:

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